

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER  
LTD.

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE  
LIBRARY GENESIS PROJECT d/b/a  
LIBGEN.ORG, ALEXANDRA ELBAKYAN,  
JOHN DOES 1-99,

Defendants.

Index No. 15-cv-4282 (RWS)

**PLAINTIFFS' RULE 7.1**  
**STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Plaintiffs Elsevier Inc., Elsevier B.V., and Elsevier Ltd. certify as follows:

1. Elsevier B.V. is wholly owned by Reed Elsevier Nederland BV. Reed Elsevier Nederland BV is not a publicly held company. Reed Elsevier Nederland BV is wholly owned by Reed Elsevier Overseas BV, which is wholly owned by Reed Elsevier Holdings BV. The ultimate parents of Reed Elsevier Holdings BV are Reed Elsevier plc and Reed Elsevier NV. Reed Elsevier plc and Reed Elsevier NV are publicly held companies that own 10% or more of the stock in Reed Elsevier Holdings BV.


2. Elsevier Inc. is a subsidiary of Mosby Holdings Corp., which is a subsidiary of Elsevier STM Inc. Elsevier STM Inc. is a wholly owned subsidiary of Reed Elsevier Inc. The ultimate parents of Reed Elsevier Inc. are Reed Elsevier plc and Reed Elsevier NV. Reed

Elsevier plc and Reed Elsevier NV are publicly held companies that own 10% or more of the stock in Reed Elsevier Inc.

3. Elsevier Ltd. is a wholly owned subsidiary of Reed Elsevier (UK) Ltd. The ultimate parents of Reed Elsevier (UK) Ltd. are Reed Elsevier plc and Reed Elsevier NV. Reed Elsevier plc and Reed Elsevier NV are publicly held companies that own 10% or more of the stock in Reed Elsevier (UK) Ltd.

Dated: New York, New York  
June 3, 2015

DEVORE & DEMARCO LLP

By:   
\_\_\_\_\_  
Joseph V. DeMarco (JVD-3499)  
David M. Hirschberg  
Urvashi Sen  
99 Park Avenue – Suite 1100  
New York, New York 10016  
(212) 922-9499

*Attorneys for Plaintiff Elsevier Inc.,  
Elsevier B.V., and Elsevier Ltd.*